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SAFELITE FULFILLMENT, INC.

11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA
13

14 YADIR A. ONTIVEROS, as an
individual, and on behalf of all others
15 similarly situated,

16 Plaintiffs,

17 vs.

18 SAFELITE FULFILLMENT, INC., A
Delaware Corporation; SAFELITE
19 GROUP, INC., a Delaware Corporation;
SAFELITE GLASS CORP., a Delaware
20 Corporation; and DOES 1 through 10,

21 Defendants.
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Case No. 2:15-cv-07118-DMG-RAO

**DECLARATION OF MARIA Z.
STEARNS IN SUPPORT OF
DEFENDANT SAFELITE
FULFILLMENT, INC.'S
OPPOSITION TO PLAINTIFF'S *EX*
PARTE APPLICATION**

[Filed concurrently with Defendant
Safelite's Opposition to Plaintiff's *Ex*
Parte Application]

Judge: Hon. Dolly M. Gee
Court Room: 8C

DECLARATION OF MARIA Z. STEARNS

I, Maria Z. Stearns, declare as follows:


1. I am a Partner at the law firm of Rutan & Tucker, LLP, counsel of record for Defendant Safelite Fulfillment, Inc. ("Safelite") in this action (pending Court approval of requested substitution of counsel). I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. I make this Declaration in support of Defendant Safelite's Opposition to Plaintiff's Ex Parte Application. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. On or about August 21, 2017, Safelite sent current and former putative class members the following four documents: (1) a memorandum explaining the nature of Plaintiff's lawsuit and offering to settle the employee's individual claims ("Memo"); (2) a fact sheet explaining in more detail the lawsuit and the settlement offer ("Fact Sheet"); (3) an individual settlement agreement ("ISA"); and (4) a settlement check ("Settlement Check"). Safelite sent the Memo, Fact Sheet, and ISA in both English and Spanish. True and correct copies of the Memo, Fact Sheet, ISA and Settlement Check (with employee name information redacted), are attached as Exhibits 1-4.

3. The settlement offers issued to the putative class members ranged in value from \$250 to \$1,500, with the average amount being offered at approximately \$750.

Executed on August 24, 2017, at Costa Mesa, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Maria Z. Stearns